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Attorneys for Wells Fargo Dealer Services, Inc. Formerly known
as Wachovia Dealer Services, Inc. and WFS Financial, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SHANEE N. POLLITT, on behalf
of herself and all others
similarly situated,

Plaintiff,

v.

DRS TOWING, LLC, d/b/a
ADVANCED FINANCIAL SERVICES,
WACHOVIA DEALER SERVICES,
INC., d/b/a WDS, INC., WFS
FINANCIAL, INC., and JOHN
DOES, 1 to 10

Defendants.

Hon. Anne E. Thompson, U.S.D.J.
Hon. Douglas E. Arpert, U.S.M.J.

Civil Action No. 10-CV-01285
(AET) (DEA)

Document Electronically Filed

**AMENDMENT TO ANSWER TO AMENDED
COMPLAINT**

Defendant Wells Fargo Dealer Services, Inc., formerly known
as Wachovia Dealer Services, Inc. and WFS Financial Inc.

("WDS"),¹ by way of Amendment to its Answer to the Amended Complaint, says:

81. It admits that the storage charge State Line charged to plaintiffs was in excess of the price set forth in the written contract between State Line and Wachovia, but denies that the charge was in excess of the price for vehicle storage State Line and Wachovia had agreed to in their subsequent course of conduct.

85. It admits the allegations contained in Paragraph 85, but refers to the contract between WDS and State Line Auto Auction ("State Line"), and the parties' practice thereunder, with respect to the approval and authorization of transportation fees.

115. It admits the allegations contained in Paragraph 115, but refers to its contract with repossession agents for the circumstances under which audits may be performed.

117. It admits the allegations contained in Paragraph 117, but refers to its contracts with repossession agents for the circumstances under which it is entitled to receive assurances as to the personnel of such agents.

¹ Wachovia Dealer Services, Inc. is now known as Wells Fargo Dealer Services, Inc. There is no entity named WFS Financial.

127. It admits the allegations contained in Paragraph 127

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Attorneys for Wells Fargo Dealer
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Wachovia Dealer Services, Inc. and
WFS Financial, Inc.

By: _____

John D. North

Dated: August 23, 2011